Please allow me to register my opposition to the rule making proposal RM-10867 for the following reasons:

The ARRL proposal in question is neither simple, elegant, wise, or cost effective. If the goal of the FCC is to simplify license structure within the Amateur Service, then the creation of a whole new license structure is not only not in keeping with that goal, but also expensive. The ARRL plan also offers blanket promotion to General Class, those lower class licensees who have yet to successfully pass Element 3. This makes no sense for a number of reasons, not the least of which are the questions of safety that are covered under the Element 3 exam, and ultimately does not represent the best interests of the Amateur Service because it will not require the current Technician, Technician with Morse Code, and Novice licensees to pass Element 3.

Simplification of license structure should be simple, and should involve the best expenditure of effort and money to accomplish the goal, not a complicated restructuring that redraws boundaries and reassigns privileges without demanding the basic testing procedures that have been in place for years within the Amateur Service.

Because I believe in the historical role of the Amateur Service, I also believe that the value of a Morse Code requirement cannot be understated. Those Amateurs, like myself, who are both new to the hobby and who have also passed Element 1, find ourselves challenged to put that knowledge to use, and use the mode as much as possible. It is this kind of challenge that is good for our service, as it expands the knowledge and skill bases of our operators, especially in modes that are highly useful in emergency communications under adverse atmospheric conditions. There are still times, and will be times in the future, when CW is the only practical mode to use, and it is still of value to the Amateur Service to have Element 1.

In closing, I do not believe that the ARRL proposal is in the best interests of the Amateur Service and request that the FCC consider other petitions that are more cost efficient and in keeping with the desires and needs of the amateur radio community.